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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MATTHEW
BUTTERICK IN SUPPORT OF
PLAINTIFFS' SUMMARY JUDGMENT
OPPOSITION AND REPLY**

I, Matthew Butterick, declare:

1. I am an attorney licensed to practice in California. I am co-counsel for Plaintiffs Christopher Golden, Richard Kadrey, and Sarah Silverman in this action. I have personal knowledge of the matters stated below. I can competently testify about them. I make this declaration under 28 U.S.C. § 1746 regarding exhibits I have prepared under Federal Rule of Evidence 1006 in support of Plaintiffs' Summary Judgment Opposition and Reply.

2. **Description of Exhibit A:** On or around March 26, 2025, Meta produced documents with Bates labels Meta_Kadrey_00237772 through Meta_Kadrey_00237779. Below, I call these the **Meta Filesystem Documents**. These documents appear to comprise a listing of files contained in a filesystem directory called

[REDACTED]

3. [REDACTED]

[REDACTED]

4. I have personally visited the shadow library known as Library Genesis (aka "LibGen") at the URL 'https://libgen.is'. Each pirated book file hosted on LibGen is associated with a unique 32-character hexadecimal string called an *MD5 hash*. For instance, my book *Typography for Lawyers* appears on LibGen and is associated with the MD5 hash "A288E549C5A3C9B6254745151CFD1E8A". Furthermore, the main LibGen URL for my book incorporates this MD5 hash:

<https://libgen.is/book/index.php?md5=A288E549C5A3C9B6254745151CFD1E8A>

5.

6. **Exhibit A** contains

7. **Exhibit A** contains seven columns:

8. Meta did not produce the underlying data files for the filenames found in the Meta Filesystem Documents. But the most reasonable inference is that

9. **Explanation of Exhibit B:** During my work on this case, I reviewed the [REDACTED]

10. [REDACTED]

11. The metadata for each data record in [REDACTED]

12. I identified books in the [REDACTED]

13. To find [REDACTED]

14. Furthermore, to ensure that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. **Exhibit B** is a true and correct copy of a table summarizing the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 7, 2025 in Los Angeles, California.

By: /s/ Matthew Butterick
Matthew Butterick